

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-cv-00957-SDJ

**DEFENDANT GOOGLE LLC'S UNOPPOSED  
MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant Google LLC respectfully files this motion to seal the unredacted copy of its Answer to the Amended Complaint. Concurrent with this motion, Google has filed a redacted copy of its Answer. Dkt. 96.

The Court previously granted Google's Motion for Leave to File under seal the unredacted copy of its Answer. Dkt. 70. The Answer to the Amended Complaint likewise includes Google's responses to allegations that Plaintiffs redacted from their publicly filed Amended Complaint because they reveal certain confidential information of Google and third parties obtained pursuant to Tex. Bus. & Com. Code 15.01, *et seq.* Plaintiffs filed a motion to seal this information, and the Court granted the motion. Dkts. 75, 78.

In the interest of protecting its own confidential information and that of third parties, Google seeks leave to file the unredacted copy of its Answer to the Amended Complaint under seal. Granting this motion is consistent with the Court's orders sealing Google's original Answer and the underlying redacted allegations in the Amended Complaint, and it will continue to protect confidential information produced pursuant to the Texas Antitrust Act.

### CONCLUSION

For these reasons, defendant Google respectfully requests that the Court grant Google leave to seal the unredacted copy of its Answer to the Amended Complaint.

Dated: April 6, 2021

Respectfully submitted,

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### CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(h), I certify that on April 5, 2021, counsel for Defendant conferred by e-mail with Ashley Keller and Zeke DeRose, counsel for the States of Texas, Idaho, South Dakota, and North Dakota, regarding whether Plaintiffs oppose this motion. According to Mr. Keller, Plaintiffs are unopposed.

/s/ Bryce L. Callahan  
Bryce L. Callahan

**CERTIFICATE OF SERVICE**

I certify that this document was filed electronically in compliance with Local Rule CV-5(a) on April 6, 2021, and was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Bryce L. Callahan  
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